

# **Exhibit B**

Defendants  
counsel  
3/23/10

**SEARCH TERMS FROM DEFENDANTS-COUNTERCLAIMANTS IN UNITED CENTRAL BANK v KANAN FASHIONS, INC. ET. AL., No. 10 cv 00331**

**General Notes:**

These Search Terms are NOT case sensitive.

The use of "[space]" is a visual reference for a single SPACE.

All searches performed using these words should include the use of derivations where appropriate to ensure the production of relevant evidence. As a result, "!" should be used for each search term

**Loans and Letters of Credit ("LOC") at Issue**

These tracking numbers identify Loans/Letter of Credits ("LOC") documents that are at issue. It would logically follow that communications internal to the Mutual Bank or United Central Bank (we refer to either as "the Bank") would likely use or reference these numbers.

#29320	#29330	#29340	#324700	#372700
#98601	60181	98600	98601	ILCMIL001426
ILCMIL001485	001485	001426	ATT3691	N008
N009	ATT43691	N002	20090831115804496	
1303005887	#1303005887	29330	29340	324700
29320				

**Amounts of Loans/Letters of Credit at Issue**

These numerical numbers that are found in excel, word or emails are likely to be relevant to the case.

\$1,766,000	\$100,000	\$2,320,000	\$23,500,000	\$26,500,000
\$591,000	\$8,323,298			

**Significant Dates Relevant to Loans/Letters of Credit at Issue**

These dates are provided in multiple formats as UCB personnel might have referred to these dates in documents as applied to persons of interest – or the loan number. It is our belief that these dates will trigger on internal documents and discussions of interest. It might make sense depending on the hits generated to refine these dates.

01-23-2011	01.23.2011	01/23/2011	03-08-2005	03-08-2006
03-08-2010	03.08.2005	03.08.2006	03.08.2010	03/08/2005
03/08/2006	03/08/2010	04-12-2006	04-27-2007	1-23-2011
1.23.2011	1/23/2011	10-23-2009	10.23.2009	10/23/2009
11-11-2009	11.11.2009	11/11/2009	3-8-2005	3-8-2006
3-8-2010	3.8.2005	3.8.2006	3.8.2010	3/8/2005
3/8/2006	3/8/2010	4-07-2007	4-12-2006	4-27-2007
4-30-2015	4-7-2007	4.07.2007	4.12.2006	4.27.2007
4.30.2015	4.7.2007	4/07/2007	4/12/2006	4/27/2007
4/30/2015	4/7/2007	6-03-2009	6-22-2006	6-22-2008
6-23-2004	6-3-2009	6.22.2006	6.22.2008	6.23.2004

6/22/2006	6/22/2008	6/23/2004	6/3/2009	7-07-2006
7-28-2006	7-7-2006	7.07.2006	7.28.2006	7.7.2006
7/07/2006	7/28/2006	7/7/2006	8-05-2009	8-22-2009
8-5-2009	8.05.2009	8.22.2009	8.5.2009	8/05/2009
8-4-2009	8.04.2009	8/14/09	8.4.2009	8-14-2009
8.14.2009	8/14/09			
8/22/2009	8/5/2009	apr. 12, 2006	apr. 27, 2007	apr. 30, 2015
apr. 7, 2007	april 12, 2006	april 27, 2007	april 30, 2015	april 7, 2007
aug. 22, 2009	aug. 5, 2009	august 22, 2009	august 5, 2009	jan. 23, 2011
january 23, 2011	july 28, 2006	july 7, 2006	june 22, 2006	june 22, 2008
june 23, 2004	june 3, 2009	mar. 8, 2005	mar. 8, 2006	mar. 8, 2010
march 8, 2005	march 8, 2006	march 8, 2010	nov. 11, 2009	november 11, 2009
oct. 23, 2009	october 23, 2009	august 4, 2009	august 14, 2009	

### **Names of Involved Individuals and Companies**

These terms seek to identify persons, documents and discussions between individuals involving matter at hand. General note - based on the results it might be appropriate to require a result to have the keyword fdic[space] with a minimum of two of these terms (i.e., joshi.....[fdic][space].....

annie	benik	Blumenthal	pjoshi	MShah
cicero	dave clark	dhawan	Gee	Hubbard
jbenik	Joshi	karuna	Khan	Laffee
lively	Luke	magnuson	Mehul	Mishra
Nassirulah	niki	Norma	pacocha	sschreiber
paresh	Salil	schreiber	Shah	sustido
svehla	Sylvia	varsha	verga	Gosiewski
kohl	Raven	smishra	annie.gee	dlaffee
dlaffee	cmagnuson		sylvia.hubbard	
andy.cicero		joesph.svehla	svehla	micheleg
kdhawan		Nassir	Manby	Hansel
Morrow		Nasir	dclark	Bell

### **Terms Associated With Kanan Companies**

These terms can reasonably be expected to identify documents and communications relating to the Kanan transactions.

22nd st.	22nd street	aurora	authority	back-to-school
cruiser	christmas season	cwc[space]	exposition	kci[space]
kfi[space]	kh[space]	kanan	metropolitan	mpea[space]
oakbrook terrace pier		sri lanka	warehouse	warehousing
creative	cruises	cruiser		

### **Terms Associated With Potential Discussions Concerning Kanan By UCB staff**

These terms based on the information provided to date are expected to identify internal discussions regarding Kanan internal to UCB. Based on the initial results, it might be appropriate

to refine or combine these terms.

[space]lc[space]  
destructive  
kanan  
reaffirm  
disaffirm  
under-collateral

(45) days  
disastrous  
Kohl  
Receiver  
insecurity  
freeze

consequences  
fdic requires  
letter of credit  
severe  
1-208

damages  
impairment  
line of credit  
standby  
undercollateral

destroyed  
irrevocable  
loc[space]  
takeover